

EXHIBIT A



**GOVERNMENT
EXHIBIT
4115**

20 Cr. 110 (LJL)



EXHIBIT B

REDACTED

EXHIBIT C

Ezra Marcus & James Walsh of New York Magazine are uninformed, inaccurate, and highly irresponsible.

LIKE  REPLY 

REPORT 

dandan000 1 YEAR AGO *(Edited)*

Part 1 of 2 Sarah Lawrence College Office of the President May 9, 2019 Dear Members of the Sarah Lawrence Community, Many of you may have seen media accounts regarding a group of former students and their alleged interactions with the parent of one of those students. My heart goes out to those, SLC alumni and otherwise, whose lives may have been impacted by this parent—indeed, I hope that the spotlight now shined on them does not contribute to further distress. Though I have been, and remain, deeply troubled by these accounts, I have thus far refrained from commenting to our community, both out of respect for the privacy and well-being of the former students involved and also because of the real limits imposed by federal law on the College's ability to discuss current and former student education records. However, certain uninformed, inaccurate, and highly irresponsible media reports and commentary compel me to share with you what I can about the facts of this matter as they relate to the College. First and foremost, the College did not knowingly allow this parent to inhabit his daughter's dormitory apartment, as claimed in media reports. The College has conducted a thorough search of its records across many offices as well as interviewed current and former staff responsible for the safety and well-being of students who were at SLC at the time of the events alleged to have occurred on our campus. On the basis of that review, we have found no evidence to support the claim that this parent lived on the campus during the 2010-11 academic year, nor that college employees who were responsible for our students' safety ignored such reports or any College policy impacting student health and safety in this regard.

LIKE  REPLY 

REPORT 

dandan000 1 YEAR AGO *(Edited)*

Part 2 of 2 Continued: I also am profoundly troubled by the demonstrably false claim that one of our long-serving campus leaders resigned as a result of these alleged events. This administrator first approached me in the summer of 2018 to share his plans to retire at the end of the 2018-19 academic year—his 20th year of dedicated service to a college he loves, and where he has steadfastly

EXHIBIT D



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

January 11, 2022

BY EMAIL

Peggy Cross-Goldenberg, Esq.
Allegra Glashausser, Esq.
Marne Lenox, Esq.

Re: *United States v. Lawrence Ray*, S1 20 Cr. 110 (LJL)

Dear Ms. Lenox:

Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure the Government hereby provides notice that it currently plans to call the following individual as a rebuttal expert witness at trial: Julie K. Schulman, M.D.

Dr. Schulman is a psychiatrist within the Department of Psychiatry at Columbia University Irving Medical Center. Her credentials, experience, and selected publications are available here: <https://www.columbiapsychiatry.org/profile/julie-k-schulman-md#credentials-amp-experience>. The Government will transmit a copy of Dr. Schulman's *curriculum vitae* soon. The Government expects Dr. Schulman will testify regarding her consultations with the defendant in August 2014, her conversations with him, and her impressions of him, as reflected in the notes and reports already produced in discovery, within US_015366 to US_015666 (the notes authored by Dr. Schulman are at US_015441 to US_015445, and US_015475 to US_015476). As reflected in her previously produced notes, Dr. Schulman concluded that "the patient's presentation has characteristics that are strongly suggestive of pseudologia fantastica, or Munchausen's disorder," and his statements and behavior raised meaningful questions about his truthfulness. Based upon her observations of and interactions with the defendant, Dr. Schulman concluded that the defendant was "not confabulating due to memory loss, nor is he psychotic or delusional." Dr. Schulman also informed the defendant that "one possibility for an elevated mercury serum level is factitious

disorder with intentional ingestion of toxic substances.”

Very truly yours,

DAMIAN WILLIAMS
United States Attorney

by: /s/ _____
Mollie Bracewell
Lindsey Keenan
Danielle Sassoon
Assistant United States Attorneys


From: [Sassoon, Danielle \(USANYS\)](#)
To: [Marne Lenox](#); [Bracewell, Mollie \(USANYS\)](#); [Keenan, Lindsey \(USANYS\)](#)
Cc: [Peggy Cross-Goldenberg](#); [Allegra Glashausser](#); [Neil Kelly](#)
Subject: RE: rebuttal expert notice
Date: Tuesday, January 18, 2022 5:43:11 PM

Hi Marne,

I spoke with Dr. Schulman and have the following additional information to share:

- Dr. Schulman's expertise is based on her specialty. In addition to her expertise in general psychiatry, she is board-certified and fellowship-trained in consultation liaison psychiatry (formerly known as psychosomatic medicine). This is essentially the study of the brain/body connection, and involves expertise in the overlap between medical and psychiatric illness. The disorders you asked about all fall under the umbrella of her expertise in assessing this overlap between medical and psychiatric illness, and her expertise in diagnosing symptoms that are not readily medically explainable. This includes assessing whether symptoms are intentional or the result of malingering, or the result of another disorder, such as one where the individual likes being a patient/in the hospital and knows he/she is creating his/her symptoms, or the result of an unconscious explanation.
- The extent of the visits and the information reviewed is reflected in the underlying medical records, which indicate that in addition to meeting with the defendant and speaking with family members, Dr. Schulman accessed easily-found public information (i.e., information from a google search of the defendant).
- While Dr. Schulman has no precise memory of the length of the visits in this case, her typical initial interview will last at least an hour, and follow up visits tend to be about half an hour or so, particularly in a case like this where the chart and lab tests will not provide all the necessary information.
- Dr. Schulman has not testified in court since at least 2007. She also has no recollection of ever testifying as an expert in court, other than a long time ago as a Resident, where on approximately two occasions she offered testimony about why a patient belonged in an in-patient psychiatric unit. Many years ago, she recalls writing reports that were used in assessing workers comp, but she did not testify. She believes she may have testified once as a fact witness about a patient. The short of it is that the Government will not be relying on prior testimony as a basis for establishing her qualifications and expertise.

Best,
Danielle

From: Marne Lenox <Marne_Lenox@fd.org>
Sent: Tuesday, January 18, 2022 3:41 PM
To: Sassoon, Danielle (USANYS) [REDACTED]; Bracewell, Mollie (USANYS) [REDACTED]; Keenan, Lindsey (USANYS) [REDACTED]
Cc: Peggy Cross-Goldenberg <Peggy_Cross-Goldenberg@fd.org>; Allegra Glashausser <Allegra_Glashausser@fd.org>; Neil Kelly <Neil_Kelly@fd.org>
Subject: [EXTERNAL] RE: rebuttal expert notice

Hi Danielle,

Any update on this?

Thanks,
Marne

From: Sassoon, Danielle (USANYS) [[mailto:\[REDACTED\]](mailto:[REDACTED])]
Sent: Wednesday, January 12, 2022 4:32 PM
To: Marne Lenox <Marne_Lenox@fd.org>; Bracewell, Mollie (USANYS) [REDACTED]; Keenan, Lindsey (USANYS) <[REDACTED]>
Cc: Peggy Cross-Goldenberg <Peggy_Cross-Goldenberg@fd.org>; Allegra Glashausser <Allegra_Glashausser@fd.org>; Neil Kelly <Neil_Kelly@fd.org>
Subject: RE: rebuttal expert notice

Hi Marne,

We received your questions and will get back to you. It may not be until next week because Dr. Schulman is unavailable this week due to a personal matter.

Danielle

From: Marne Lenox <Marne_Lenox@fd.org>
Sent: Wednesday, January 12, 2022 3:48 PM
To: Sassoon, Danielle (USANYS) [REDACTED] Bracewell, Mollie (USANYS) [REDACTED]; Keenan, Lindsey (USANYS) [REDACTED]
Cc: Peggy Cross-Goldenberg <Peggy_Cross-Goldenberg@fd.org>; Allegra Glashausser <Allegra_Glashausser@fd.org>; Neil Kelly <Neil_Kelly@fd.org>
Subject: [EXTERNAL] RE: rebuttal expert notice

Danielle,

We have a few follow up questions on your rebuttal expert disclosure:

Please provide more detail about what formed the basis of her noticed opinion. In the course of her evaluation of Mr. Ray, how many times did Dr. Schulman meet with Mr. Ray and for how long did she meet with him each time? Did she conduct any collateral interviews in forming her opinions, and if so, with whom? Has Dr. Schulman reviewed anything other than Mr. Ray's August 2014 New York-Presbyterian medical records in connection with this case or her evaluation of Mr. Ray? If so, what else has she reviewed that serves as the basis for her noticed opinion?

Please provide a list of cases where Dr. Schulman has previously offered expert testimony.

Please elaborate on Dr. Schulman's expertise in diagnosing Munchausen's disorder/pseudologia fantastica/factitious disorder/delusional disorder.

Thank you,
Marne

From: Sassoon, Danielle (USANYS) [[mailto:\[REDACTED\]](mailto:[REDACTED])]
Sent: Tuesday, January 11, 2022 3:48 PM
To: Allegra Glashausser <Allegra_Glashausser@fd.org>; Marne Lenox <Marne_Lenox@fd.org>;
Peggy Cross-Goldenberg <Peggy_Cross-Goldenberg@fd.org>
Cc: Bracewell, Mollie (USANYS) <[REDACTED]>; Keenan, Lindsey (USANYS)
[REDACTED]
Subject: RE: rebuttal expert notice

Attached is Dr. Schulman's resume.

From: Sassoon, Danielle (USANYS)
Sent: Tuesday, January 11, 2022 3:14 PM
To: Allegra Glashausser <Allegra_Glashausser@fd.org>; Marne Lenox <Marne_Lenox@fd.org>;
Peggy Cross-Goldenberg <Peggy_Cross-Goldenberg@fd.org>
Cc: Mollie E. .Bracewell [REDACTED]; Lindsey T.
.Keenan [REDACTED]
Subject: rebuttal expert notice

Marne:

Attached please find our notice of a rebuttal expert.

Best,

Danielle R. Sassoon
Assistant United States Attorney
Southern District of New York
One Saint Andrew's Plaza
New York, NY 10007
Tel: [REDACTED]